

1 DYLAN P. TODD
Nevada Bar No. 10456
2 TODD W. BAXTER
Admitted Pro Hac Vice
3 McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP
4 8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113
5 Telephone: (702) 949-1100
Facsimile: (702) 949-1101
6 *dylan.todd@mccormickbarstow.com*
todd.baxter@mccormickbarstow.com

7 ERON Z. CANNON
8 Nevada Bar No. 8013
FAIN ANDERSON VANDERHOEF
9 ROSENDAHL O'HALLORAN SPILLANE PLLC
701 5th Avenue #4750
10 Seattle, Washington 98104
Telephone: (206) 749-0094
11 Facsimile: (206) 749-0194
eron@favros.com

12 Attorneys for Plaintiffs/Counterdefendants

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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 ALLSTATE INSURANCE COMPANY,
17 ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
18 INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
23 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
24 URGENT CARE, DOES 1-100, and ROES
101-200,

25 Defendants.

26
27 AND RELATED CLAIMS
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE GANZ &
HAUF INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE
ORDER (ECF NO. 39) FOR THE
DISCLOSURE OF DOCUMENTS
PURSUANT TO F.R.C.P. 45 SUBPOENA**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the law firm GANZ & HAUF (non-party herein after referred to as "G&H") hereby stipulate and
5 agree as follows:

6 1. Plaintiffs served G&H with a subpoena pursuant to F.R.C.P. 45 for the production of
7 documents regarding communications and payments made by and between Law Firm and the
8 Defendants during G&H's representation of certain clients in personal injury claims for which
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. G&H is aware that Plaintiffs have subpoenaed several law firms seeking the same type
11 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
12 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH ("Belsky")*.

13 3. G&H understands that this Court presides over both the instant matter as well as the
14 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
15 firms to produce the same type of documents request of G&H.

16 4. A stipulated confidentiality and protective order in this case entered between Plaintiffs
17 and Defendants for the disclosure of confidential, sensitive or other protected information was
18 approved by this Court on May 20, 2016. (ECF No. 39).

19 5. G&H was not a party to the stipulated confidentiality and protective order. (ECF No.
20 39).

21 6. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
22 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

23 7. In accordance with this Court's prior rulings both in this action and in the *Belsky*
24 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
25 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
26 39) be extended in their entirety to cover G&H in its compliance with Plaintiffs' subpoena.

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1 8. G&H will produce all documents responsive to the subpoena within ten (10) days of
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 2/11/19

Dated:

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

GANZ & HAUF

7 By: /s/ Todd W. Baxter, Esq.

By: 

8 DYLAN P. TODD, ESQ.
9 Nevada Bar No. 10456
8337 West Sunset Road, Suite 350
10 Las Vegas, NV 89113
11 *Attorneys for Plaintiffs/Counterdefendants*

Adam Ganz, Esq.
Nevada Bar No. 6650
8950 W. Tropicana Ave., #1
Las Vegas, NV 89147
702-598-4529

12
13
14 ORDER

15 IT IS SO ORDERED.

16 DATED this ¹² day of February 2019

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19 UNITED STATES MAGISTRATE JUDGE
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